IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

BETH E. KENDALL,	:	Civil Action No. 10-01209
	:	
Plaintiff,	:	
	:	Hon. Nora Barry Fischer
vs.	:	
	:	
JOHN E. POTTER,	:	
	:	Electronically Filed
Defendant.	:	

PLAINTIFF'S COUNSEL'S MOTION TO WITHDRAW - IRRECONCILABLE DIFFERENCES

AND NOW, comes Plaintiff's counsel, Neal A. Sanders and Dirk D. Beuth, counsel of record for Plaintiff, and files this Plaintiff's Counsel's Motion To Withdraw - Irreconcilable Differences and states as follows:

1. There are irreconcilable differences between Plaintiff's counsel and Plaintiff which prevent Plaintiff's counsel, Neal A. Sanders and Dirk D. Beuth, in further representing the Plaintiff in this matter.

2. Plaintiff was warned of this possibility repeatedly over the last six months.

3. Plaintiff has continued to demonstrate disrespect for her counsel and their staff.

4. Plaintiff is about to embark on the most important stage of her discrimination case and she needs to be represented by a different law firm before her case proceeds further.

5. The ADR Mediation is scheduled for March 3, 2011.

6. Defendant's counsel has been notified of this Motion and has no position.

7. The Mediator, Tom May, has been notified.

8. Plaintiff has been served with a copy of this Motion and proposed Order.

9. Plaintiff's records and files will be returned to Plaintiff by January 28, 2011.

10. Plaintiff's counsel Neal A. Sanders and Dirk D. Beuth respectfully request this Motion be granted.

11. Plaintiff has also filed today, January 19, 2011, Plaintiff's Consented To Motion To Enlarge All Deadlines - 90 Days - Withdrawal Of Counsel.

12. An appropriate Order is attached.

Respectfully submitted,

LAW OFFICES OF NEAL A. SANDERS

Dated: January 19, 2011

By:/s/Neal A. Sanders
Neal A. Sanders, Esquire
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Co-Counsel for Plaintiff,
Beth E. Kendall

By:/s/Dirk D. Beuth
Dirk D. Beuth, Esquire
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